

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE	:	No. 2:12-md-02323-AB
PLAYERS' CONCUSSION INJURY	:	
LITIGATION	:	MDL No. 2323
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THIS DOCUMENT RELATES TO:	:	Hon. Anita B. Brody
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<u>ALL ACTIONS</u>	:	

DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231. I have personal knowledge or information of the facts set forth in this Declaration.

2. In connection with the class action settlement in this case, in its Amended Final Order and Judgment entered on May 9, 2015 (ECF No. 6534, at ¶ 13; *see also* ECF No. 6084, at ¶ 3.f), the Court appointed BrownGreer as the Claims Administrator under the Class Action Settlement Agreement (“Settlement Agreement”) that had received final approval on April 22, 2015. As the Claims Administrator, BrownGreer receives and reviews all Registration Forms under Article IV of the Settlement Agreement and all Claim Packages seeking Monetary Awards under Article VI of the Settlement Agreement. BrownGreer also issues all Notices of Monetary Awards under Article IX of the Settlement Agreement and facilitates the disbursement of payments under Article XXIII of the Settlement Agreement.

3. I have reviewed BrownGreer’s records. As of today, October 23, 2017, BrownGreer has facilitated payments to three Class Members who each identified a third-party

lender to which they purportedly owe a portion of their monetary award based upon a contract. Also as of today, BrownGreer is aware of four additional Class Members for whom BrownGreer already has issued Notices of Monetary Awards, and who each identified a third-party lender to which they purportedly owe a portion of their monetary award based upon a contract.

4. To date, BrownGreer has received Claim Forms identifying twenty-seven different lenders who expect to be paid portions of ninety-one different Class Members' monetary awards.

5. As of yet, BrownGreer has not received a Claim Form indicating Class Member representation by any of the law firms identified by Co-Lead Class Counsel as having been suggested to Class Members by claims services providers, Legacy Pro Sports or Case Strategies Group (formerly known as NFL Case Consulting, LLC).

I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 23rd day of October, 2017.



Orran L. Brown, Sr.